

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

SEA SHEPHERD CONSERVATION SOCIETY,

Plaintiff,

v.

PAUL WATSON, THE CAPTAIN PAUL
WATSON FOUNDATION, SEA SHEPHERD
ORIGINS,

Defendants.

Case No. 2:22-cv-00227-wks

**DECLARATION OF LAMYA ESSEMLALI IN SUPPORT OF
DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION AND IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

I, Lamya Essemlali, hereby declare:

1. I am a citizen of France and live in France.
2. Sea Shepherd Origins is a non-for-profit entity that was organized and registered under the laws of France on or about November 21, 2022. *See Ex. 1, Récépissé de Déclaration de CREATION de l'association n° W751267683, MINISTÈRE DE L'INTÉRIEUR (Nov. 21, 2022).*
3. I serve as the Vice President of Sea Shepherd Origins and I am also a member of its board of directors.
4. The mailing address for Sea Shepherd Origins is 139 Rue du Faubourg Saint-Denis, 75010 -- Paris, France. *See id.*
5. Sea Shepherd Origins has no facilities, offices, or employees in Vermont.
6. Sea Shepherd Origins is not registered to do business in Vermont.
7. Sea Shepherd Origins does not own or lease real property in Vermont.
8. Sea Shepherd Origins has no registered agent for service of process in Vermont.
9. Sea Shepherd Origins does not pay Vermont state taxes.

10. Sea Shepherd Origins is not “led, conceived and controlled by Paul Watson” as Sea Shepherd Conservation Society (“SSCS”) states in its Complaint. Sea Shepherd Origins is an international coalition that was established by the heads of several of the independent international Sea Shepherd entities, including myself (I also serve as President of Sea Shepherd France), Robert Darran Read (Chief Operating Office of Sea Shepherd UK), Nathalie Nazareth Cote Gil (CEO of Sea Shepherd Brazil), as well as by Paul Watson (former Director of SSCS), and Clementine Pallanca (former Director of SSCS). These five individuals, four of whom are not even citizens of the United States (*e.g.*, myself, Read, Gil, and Pallanca), also comprise the Sea Shepherd Origins board or management team.

11. The creation of Sea Shepherd Origins was my idea and something I first proposed to Read and Gil to see if their independent Sea Shepherd entities would want to join along with Sea Shepherd France. Thereafter, we three approached Captain Watson and asked if he and the newly formed Captain Paul Watson Foundation (the “Foundation”) would want to join Sea Shepherd Origins as well.

12. Presently, the entities that are part of Sea Shepherd Origins are Sea Shepherd France, Sea Shepherd UK, Sea Shepherd Brazil, Sea Shepherd New Calendonia, Sea Shepherd Hungary, and the Foundation. Accordingly, only one of the entities that are part of Sea Shepherd Origins is located in the United States (*i.e.*, the Foundation) and *none* are located in Vermont.

13. All of the international Sea Shepherd entities affiliated with Sea Shepherd Origins are and have always been “independent entities” that, as participants in the Sea Shepherd global movement for many years, have the right to use the “Sea Shepherd” name and Sea Shepherd logos they registered for activities in their local country as they deem fit (with the exception of Sea Shepherd Hungary). In fact, each of the international Sea Shepherd entities comprising Sea Shepherd Origins has long identified as an “independent” Sea Shepherd

entity without any complaint or attempted interference by SSCS. To the best of my knowledge, SSCS has never attempted to control or has never claimed any right to control in any way the use by Sea Shepherd France of the names “Sea Shepherd” or “Sea Shepherd France” to identify itself as a member of the Sea Shepherd movement.

14. Because Sea Shepherd Origins is merely an alliance of existing independent Sea Shepherd entities, one wishing to support campaigns of any of these independent entities can go to the Sea Shepherd Origins website and click on the link to that particular entity to make a donation. *See Ex. 2, Donations, SEA SHEPHERD ORIGINS*, <https://seashepherdorigins.org/donations/>. In other words, the donation is ultimately made on the individual webpage or the Facebook page for the particular independent entity, not on the Sea Shepherd Origins website itself.

15. The home page of the Sea Shepherd Origins website includes a graphic that identifies which Sea Shepherd entities are part of Sea Shepherd Origins and which are not yet part of Sea Shepherd Origins. *See Ex. 3, Home, SEA SHEPHERD ORIGINS*, <https://seashepherdorigins.org/>.

16. The home page of the Sea Shepherd Origins website also expressly states that it is “completely separated from” and not associated or affiliated in any way with SSCS or Sea Shepherd Global, and also states that it is not involved in any campaigns led by SSCS or Sea Shepherd Global. *See id.*

17. Although Sea Shepherd Origins’ website is accessible worldwide, nearly all of its website traffic is from outside the United States and there is virtually no website traffic in Vermont. Sea Shepherd Origins does not target Vermont residents for donations or other activities.

18. I have reviewed the data derived from Shepherd Origins’ website and it shows that, since the organization’s formation and through January 20, 2023, there have been 34,991

visits to the website and almost 63% of these visits were from France (25,885) and less than 6% (1,859) were from the United States. Of the 1859 visits from individuals in the United States, only 15 can be directly traced to the State of Vermont.

19. Visitors to the Sea Shepherd Origins website also have the opportunity to sign their commitment to support the core values of the organization. Presently, 10,300 signatures have been received, only 107 (1%) of which are from the United States—and there is no indication that any of those are from the State of Vermont.

20. As for donations, Sea Shepherd Origins is not aware of a single Vermont resident who has made a donation via the Sea Shepherd Origins website to the affiliated entities.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 20th day of January, 2023

By:

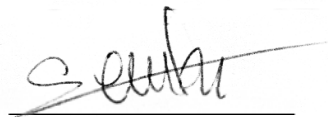

Lamya Essemli

EXHIBIT 1



PREFECTURE DE POLICE

Direction des Transports et de la Protection du Public
SDPSES - BPAS
section associations
1 bis, rue de Lutèce
75004 PARIS

Le numéro W751267683
est à rappeler dans toute
correspondance

Récépissé de Déclaration de CREATION
de l'association n° W751267683

Vu la loi du 1er Juillet 1901 relative au contrat d'association ;

Vu le décret du 16 Août 1901 portant règlement d'administration publique pour l'exécution de la loi précitée ;

Le préfet de police

donne récépissé à **Monsieur le Représentant**

d'une déclaration en date du : **21 novembre 2022**

faisant connaître la constitution d'une association ayant pour titre :

SEA SHEPHERD ORIGINS

dont le siège social est situé : 139 rue du Faubourg Saint Denis
75010 Paris

Décision prise le : **31 octobre 2022**

Pièces fournies : Statuts
Procès-verbal
lettre de mandat
liste des dirigeants

Paris 15^e, le 22 novembre 2022

Pour le Préfet de Police et par délégation,
l'Adjointe à la Cheffe du Bureau
des Polices Administratives de Sécurité

Sidonie DERBY

Loi du 1 juillet 1901, article 5 - al 5,6 et 7 - Décret du 16 août 1901, article 3 :

Les associations sont tenues de faire connaître, dans les trois mois, tous les changements survenus dans leur administration ou leur direction, ainsi que toutes les modifications apportées à leurs statuts. Ces modifications et changements ne sont opposables aux tiers qu'à partir du jour où ils auront été déclarés.

Loi du 1 juillet 1901, article 8 - al 1 :

Seront punis d'une amende de 1500 € en première infraction, et, en cas de récidive, ceux qui auront contrevenu aux dispositions de l'article 5.

NOTA :

L'insertion au Journal Officiel des modifications portant sur le titre, l'objet, le siège social d'une association est facultative. Elle ne peut être exigée des tiers car le récépissé délivré par les services préfectoraux fait foi dans tous les cas.

La loi 78-17 du 6 janvier 1978 modifiée relative à l'informatique, aux fichiers et aux libertés, s'applique à la déclaration relative à votre association dont les destinataires sont les services préfectoraux et les services de l'Etat concernés. L'article 40 de cette loi vous garantit un droit d'accès et de rectification. Celui-ci peut s'exercer auprès du préfet ou du sous-préfet de l'arrondissement du siège de votre association, pour les données à caractère personnel concernant les personnes physiques déclarées comme étant chargées de sa direction ou de son administration.



EXHIBIT 2



[HOME](#)

[OUR ORIGINS](#)

[OUR MISSION](#)

[ABOUT ORIGINS](#)  

[NEWS](#)

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[DONATE](#)


MAKE A DONATION


Donate to our entities around the world and make a difference for the ocean





visit consent button


Make a donation to our
participating entities
worldwide:


[Sea Shepherd France](#) 

[Sea Shepherd UK](#) 

[Sea Shepherd Brazil](#) 

[Sea Shepherd Hungary](#) 

[Sea Shepherd New Caledonia](#) 

[Captain Paul Watson Foundation \(USA\)](#) 


For major direct donations, contact us:

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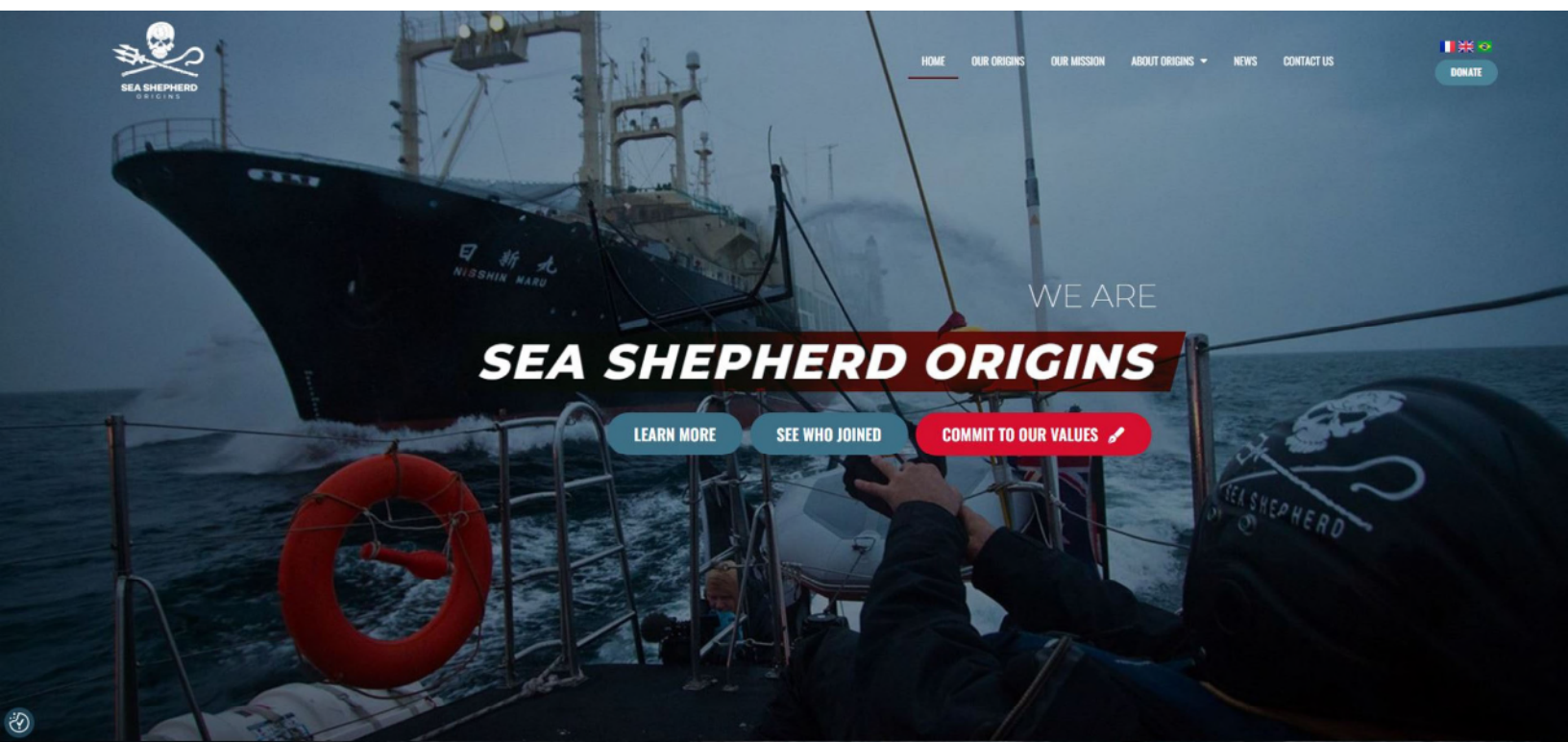
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EXHIBIT 3



WHY ORIGINS IS NEEDED

Sea Shepherd Origins has been founded to strengthen the unity of Sea Shepherd entities and prevent the movement from sliding away from its core values.

It provides to the public opinion, the media and the historical and new supporters, a clear view on the original values and ethics of Sea Shepherd, and provides a better transparency on the functioning of the organisation. It is also meant to prevent any discreet recuperation of the movement by people who are not in alliance with Sea Shepherd's original spirit and values.

Sea Shepherd Origins is an independent entity registered in France. The members of Sea Shepherd Origins are the entities that are signatories to the ethical guidelines of Sea Shepherd's original spirit of no compromise, independence from the governments and corporations directly involved in the destruction of marine ecosystems. [Click here to get to know our values.](#)

Sea Shepherd Origins is completely separated from Sea Shepherd Conservation Society (US) and Sea Shepherd Global. The entities linked to Sea Shepherd Origins are listed on this link at the bottom of this page.

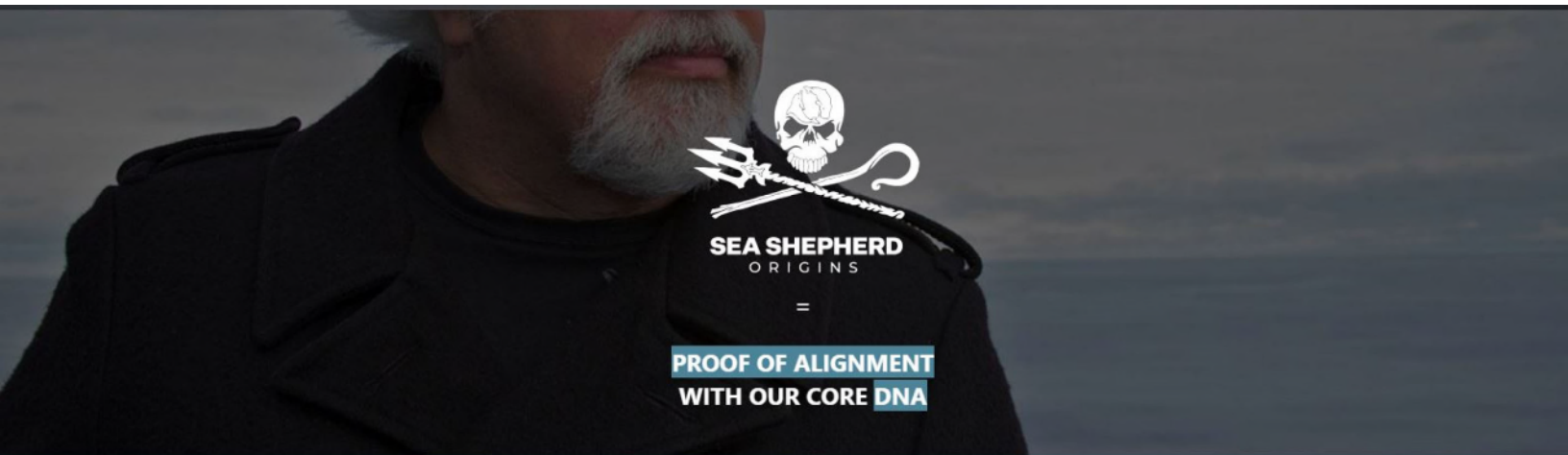
[Click here to know the campaigns led by these entities.](#)

Sea Shepherd Origins is not involved in any campaign led by SSCS or Global. SSCS and Global are not involved either financially, logistically or with human resources in any campaign led by the entities members of Sea Shepherd Origins.

Sea Shepherd Origins mission is not to raise funds to finance the campaigns of its members. Each entity raises funds for its own missions or common missions between members. Sea Shepherd Origins purpose is to be the guardian of the original spirit of Sea Shepherd and it is an alliance of all entities, whether they are named

Sea Shepherd or not, who have pledged to respect the ethical guideline of Sea Shepherd from its origins. Origins allows the general public and the supporters of the Sea Shepherd movement to have a clear vision on who has committed to respect the original values of Sea Shepherd as they were set up in 1977 by the Captain Paul Watson.





PROOF OF ALIGNMENT WITH OUR CORE DNA

BE PART OF OUR DNA

Sign your commitment to
Sea Shepherd Origins.

[SIGN YOUR COMMITMENT](#)

Do you have something to say?

Help us make sure the entities carrying the Sea Shepherd flag stay transparent, fair to all and loyal to our core values of no compromise. If you have been aboard a Sea Shepherd vessel or on a land based campaign, feel free to share your experience with us. If it was great, we do want to know. If there were issues, we want to know even more and see how we can address them.

[Talk to us](#)

REPRESENTED ENTITIES

Which Sea Shepherd entities are part of Sea Shepherd Origins?

						
Sea Shepherd France 	Sea Shepherd UK 	Sea Shepherd Brasil 	Sea Shepherd New Caledonia 	Sea Shepherd Hungary 	Cp Paul Watson Foundation 	...and more to come!
Represented by Lamy Essemlali	Represented by Robert Read	Represented by Nathalie Gil	Represented by Eva Dumas	Represented by Veronika Kristof	Represented by Capt. Paul Watson	Let us know if your Sea Shepherd entity is joining!

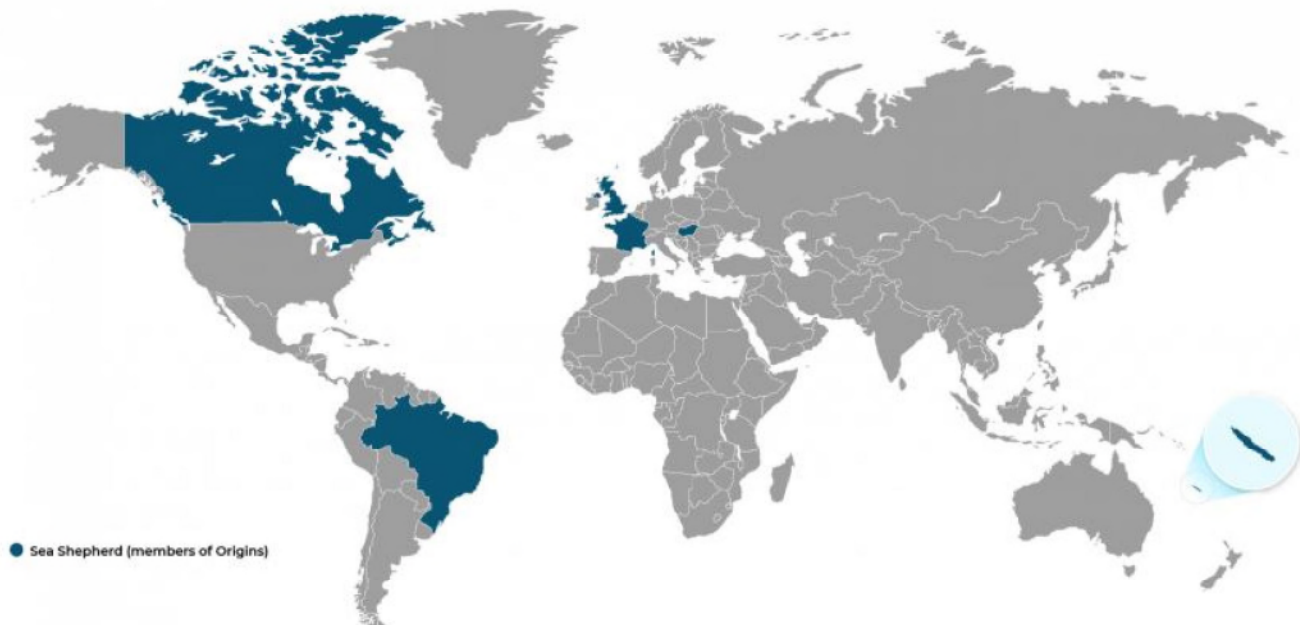
[CONTACT US](#)

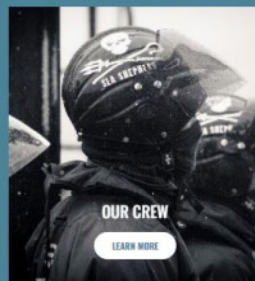
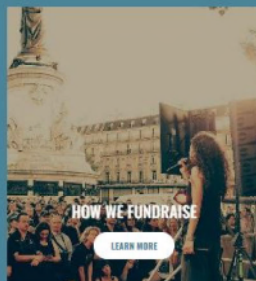
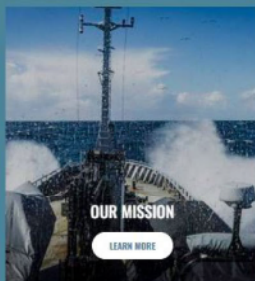
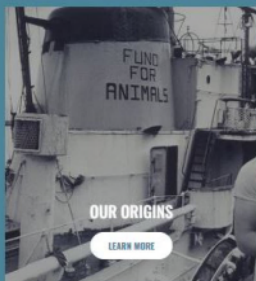
Sea Shepherd entities part of Origins

Captain Paul Watson Foundation

Sea Shepherd entities not yet part of Origins

All





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